

# **EXHIBIT 11**

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From: Jennings, Molly <Molly.Jennings@wilmerhale.com>  
Sent: Wednesday, June 21, 2023 9:33 AM  
To: Brantley Pepperman; Guiney, Noah S.; Claire Hausman; WH Facebook Private Antitrust Litigation Service List  
Cc: QE Facebook Antitrust; facebook-consumer-leads@lists.locklaw.com; FB\_AdvertiserCounsel@scott-scott.com  
Subject: Re: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

[EXTERNAL EMAIL from [molly.jennings@wilmerhale.com](mailto:molly.jennings@wilmerhale.com)]

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Brant,

Meta has no obligation to respond to your lengthy list of substantive questions concerning documents it produced outside of formal discovery requests – particularly not questions as unfocused as “please explain how the data file should be interpreted” asked for the first time in the last week of fact discovery. Nonetheless, in the interest of avoiding a dispute, we plan to produce this week a series of written responses Meta provided to certain questions identified by the FTC in lieu of providing 30(b)(6) testimony concerning data produced to the FTC. We expect that they will be informative for Users.

As to your specific questions concerning the MINT portal data: queries to the MINT portal provide data for the previous two years. Querying the MINT portal as Users specifically requested produced the files we then produced to you. There is no data available in the MINT portal for Bebo, Diaspora, flip.com, Google+, or Orkut, which is why no files for those entities were produced.

Thanks,

Molly

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From: Jennings, Molly <Molly.Jennings@wilmerhale.com>  
Sent: Friday, June 16, 2023 9:42 PM  
To: Brantley Pepperman <brantleypepperman@quinnemanuel.com>; Guiney, Noah S. <Noah.Guiney@wilmerhale.com>; Claire Hausman <clairehausman@quinnemanuel.com>; WH Facebook Private Antitrust Litigation Service List <WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com>  
Cc: QE Facebook Antitrust <qefacebookantitrust@quinnemanuel.com>; facebook-consumer-leads@lists.locklaw.com <facebook-consumer-leads@lists.locklaw.com>; FB\_AdvertiserCounsel@scott-scott.com <FB\_AdvertiserCounsel@scott-scott.com>  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Brant,

Please see attached correspondence.

Thanks,

Molly

From: Brantley Pepperman <brantleypepperman@quinnemanuel.com>  
Sent: Friday, June 16, 2023 4:27 PM  
To: Jennings, Molly <Molly.Jennings@wilmerhale.com>; Guiney, Noah S. <Noah.Guiney@wilmerhale.com>; Claire Hausman <clairehausman@quinnemanuel.com>; WH Facebook Private Antitrust Litigation Service List <WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com>  
Cc: QE Facebook Antitrust <qefacebookantitrust@quinnemanuel.com>; facebook-consumer-leads@lists.locklaw.com; FB\_AdvertiserCounsel@scott-scott.com  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

EXTERNAL SENDER

Molly,

It has been 3 weeks since Consumers sent the below correspondence concerning Facebook's re-production of structured data from the FTC case. We do not believe we have received a response—please provide one.

Consumers have additional questions regarding the FTC data, which are contained in the attached letter. We ask that Facebook promptly provide responses to these questions as well.

Finally, we understand that Facebook was to this week complete its production of structured data to the FTC. Please confirm whether Facebook has done so, and when Facebook will make any such production(s) available to Consumers in this case.

Thanks,

Brant

Brantley I. Pepperman  
Associate  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3561 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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From: Brantley Pepperman  
Sent: Friday, May 26, 2023 8:00 PM  
To: Jennings, Molly <[Molly.Jennings@wilmerhale.com](mailto:Molly.Jennings@wilmerhale.com)>; Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Molly,

Please see the attached correspondence regarding Facebook's re-productions of structured data from the FTC matter.

Thanks,

Brant

Brantley I. Pepperman  
Associate  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3561 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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From: Jennings, Molly <[Molly.Jennings@wilmerhale.com](mailto:Molly.Jennings@wilmerhale.com)>  
Sent: Monday, May 22, 2023 12:37 PM  
To: Brantley Pepperman <[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)>; Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

[EXTERNAL EMAIL from [molly.jennings@wilmerhale.com](mailto:molly.jennings@wilmerhale.com)]

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Brant,

Following up on my email below, I understand the bulk of ComScore data was also included in our production on May 12, 2023, and can be found at PALM-017052204 through PALM-017052276.

Thanks,

Molly

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From: Jennings, Molly  
Sent: Monday, May 22, 2023 10:58 AM  
To: Brantley Pepperman <[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)>; Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Brant,

We understand that, in addition to data from ComScore and App Annie, the MINT Portal included Onavo data and Study data at various times. The bulk of the underlying App Annie, Onavo and Study data was included in the data production that we made on May 12, 2023:

- App Annie: PALM-017052316 through PALM-017052405
- Study: PALM-017052581 through PALM-017052632, and PALM-017052725 through PALM017052726
- Onavo: PALM-017052633 through PALM-017052720

We intend to produce the remaining data underlying the MINT Portal, including ComScore data, early next week. In addition, we have also queried the MINT Portal for the data requested for in your April 11 letter. We are actively reviewing and processing the data and intend to produce them shortly. We will provide a further update on timing when we have one.

Apart from the MINT data, next week's production will include additional structured data produced to the FTC this week. Also, we understand that Meta will make additional structured data productions to the FTC. We will reproduce that data to *Klein* plaintiffs on a rolling basis, and expect to have completed these additional productions by the end of next week.

Thanks,

Molly

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From: Brantley Pepperman <[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)>

Sent: Thursday, May 18, 2023 4:08 PM

To: Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>

Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)

Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

EXTERNAL SENDER

Counsel,

I am again following up on Consumer Plaintiffs' requests regarding the MINT Portal. Our requests have now been pending for more than 3 months, and it has now been 5 weeks since our April 11 letter and 3 weeks since Facebook on April 27 committed to provide a response. Please provide a date certain by which Facebook will produce the requested data, files, and information.

Brant

Brantley I. Pepperman  
Associate  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3561 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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From: Brantley Pepperman

Sent: Wednesday, May 10, 2023 3:52 PM

To: Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)

Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Noah,

We confirm. We understand, as the parties agreed, Facebook will produce the data on May 12.

We appreciate your confirmation that Facebook will separately follow up regarding the MINT Portal requests. Please provide a date certain by which Facebook will produce the requested data, files, and information. Our requests have been pending for nearly three months, and we have not received a response to our April 11 letter regarding the MINT Portal requests, despite Facebook's April 20 representations to the Court that Facebook "expects to respond in the near term" (Dkt. 533 at 7), and its April 27 agreement to provide a response as soon as possible.

Thanks,

Brant

Brantley I. Pepperman

*Associate*

Quinn Emanuel Urquhart & Sullivan, LLP

865 S. Figueroa Street, 10th Floor

Los Angeles, CA 90017

213-443-3561 Direct

213-443-3000 Main Office Number

213-443-3100 Fax

[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)

[www.quinnemanuel.com](http://www.quinnemanuel.com)

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From: Guiney, Noah S. <[Noah.Guiney@wilmerhale.com](mailto:Noah.Guiney@wilmerhale.com)>

Sent: Wednesday, May 10, 2023 11:23 AM

To: Brantley Pepperman <[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)>; Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>

Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)

Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

[EXTERNAL EMAIL from [noah.guiney@wilmerhale.com](mailto:noah.guiney@wilmerhale.com)]

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Brant,

The structured data Meta has agreed to produce in this case will all be marked "Highly Confidential" pursuant to the Protective Order. Section 7.2(c) of the Protective Order requires that all experts sign a "Acknowledgment and Agreement to Be Bound" to the Order, included in the Protective Order as Exhibit A, before they can receive information designated "Highly Confidential."

Meta is willing to produce the structured data via hard drive to the addresses listed below (along with the letters concerning this data sent by Meta to the FTC and a cross-reference comparing the data's bates numbers in the FTC case with their bates numbers in *Klein*) so long as you confirm that all of the experts who will access the data have signed an Acknowledgment and Agreement to Be Bound. Please promptly provide such confirmation.

We will follow up on the MINT portal requests separately.

Best,  
Noah

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From: Brantley Pepperman <[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)>  
Sent: Wednesday, May 10, 2023 8:59 AM  
To: Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

EXTERNAL SENDER

Counsel,

I am following up on my below email. Please confirm that Facebook will produce the FTC structured data in the manner described in my below email (*i.e.*, by hard drive to the addresses listed below). Please also provide an update regarding Consumers' request for data from the MINT Portal and Facebook's response to that request.

Thanks.

Brant

Brantley I. Pepperman  
Associate  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3561 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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From: Brantley Pepperman  
Sent: Thursday, May 4, 2023 12:51 PM  
To: Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>; WH Facebook Private Antitrust Litigation Service List <[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>  
Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com); [FB\\_AdvertiserCounsel@scott-scott.com](mailto:FB_AdvertiserCounsel@scott-scott.com)  
Subject: RE: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Counsel,

I write to follow-up on Consumer Plaintiffs' and Facebook's agreement regarding structured data. We understand that by May 12 Facebook will re-produce to Consumer Plaintiffs the structured data Facebook already produced in the *FTC* litigation, and then, on a rolling basis, re-produce to Consumer Plaintiffs any further structured data that Facebook produces in the *FTC* litigation. We also understand that Facebook's re-productions will include the production correspondence Facebook provided to the FTC describing the data, that the data will be re-produced to us in such a way that we are able to use the correspondence to interpret the data (*e.g.*, there will be a way to address any different Bates numbering for the data as between the *FTC* and *Klein* cases), and that if Facebook learns any data dictionaries were produced in the *FTC* case, Facebook will reproduce those data dictionaries to us as well.

So that we can promptly load the data after receiving it, we request that Facebook provide the data via hard drive and ask that Facebook make three copies. Please send the hard drives to the following addresses:

Legal Economics  
Attn: Thor Sletten  
1305 Westwood Ave.  
Columbus, OK 43212

EconOne  
Attn: Justin Waller  
550 S. Hope St., Suite 800  
Los Angeles, CA 90071

Bates White  
Attn: Neil Gautam  
20011 K Street NW, North Building, Suite 500  
Washington, DC 20006

Separately, we understand that Facebook is looking into the requests contained in my April 11, 2023 letter regarding the MINT Portal. Please advise when we can expect a further update from Facebook regarding those MINT Portal items.

Thanks,

Brant

Brantley I. Pepperman  
*Associate*  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3561 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
[brantleypepperman@quinnemanuel.com](mailto:brantleypepperman@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)



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From: Claire Hausman <[clairehausman@quinnemanuel.com](mailto:clairehausman@quinnemanuel.com)>

Sent: Wednesday, April 19, 2023 6:48 PM

To: WH Facebook Private Antitrust Litigation Service List

<[WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com](mailto:WHFacebookPrivateAntitrustLitigationServiceList@wilmerhale.com)>

Cc: QE Facebook Antitrust <[qefacebookantitrust@quinnemanuel.com](mailto:qefacebookantitrust@quinnemanuel.com)>; [facebook-consumer-leads@lists.locklaw.com](mailto:facebook-consumer-leads@lists.locklaw.com)

Subject: No. 3:20-cv-08570-JD, Klein v. Meta Platforms, Inc - structured data requests

Counsel,

On December 23, 2022, Consumers served their Fifth Set of Requests for Production to Facebook requesting various structured data. Four months later, Consumers have not received responsive structured data from Facebook. We look forward to resolving negotiations regarding these document requests as soon as possible. However, Facebook's delay in producing responsive data is affecting Consumers ability to prepare their expert case. In an attempt to address this situation without briefing it to the Court while the parties may still be able to resolve it on their own, Consumers request that Facebook re-produce in this case, the structured data that Facebook produced to the FTC in the *FTC* case currently pending before Judge Boasberg. Doing so imposes no burden on Facebook and may help resolve the parties' negotiations more quickly. Additionally, Consumers hope it will get them at least some of the data relevant to preparing their expert case more quickly. To the extent there is certain structured data produced in the *FTC* case that Facebook believes has no relevance in this case, we are willing to forgo its production if Facebook identifies the data it is withholding and we agree it is not relevant. Please let us know Facebook's response to this request by April 24.

Regards,

Claire